

99-184

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May 7, 1999

Sacramento

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Ms. Judy Heath
Water Quality Program
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1148
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Subject: Comments on Proposed Water Quality Program Actions for the CALFED Bay-Delta Program

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Dear Ms. Heath:

The Sacramento Regional County Sanitation District (District) appreciates the opportunity to comment on the CALFED Water Quality Program documents sent to the District by letter dated April 8, 1999. The District has the following key comments to present to you. The District understands that you are seeking comments both on the priority and content of two proposed action lists and comments on overall implementation strategies. The two action lists are the Draft Early Implementation Projects for years 2000 and 2001, and the Stage I Actions contained in the Revised Phase II Report.

Draft Early Implementation Items

High Priority Items

The District recommends that high priority be given to the following actions.

1. Reduction of Mercury in the Sacramento River Watershed (Bundle Action Nos. 50, 21, 22)

Mercury is a parameter of significant concern in the Sacramento River watershed. It is a potential human health problem due to its bioaccumulation in fish tissue. Health advisories have been issued in San Francisco Bay and the Sacramento-San Joaquin Delta due to concern for observed levels in fish. Similar concentrations have also been found in some fish species in the Sacramento River. Actions described in the draft Program Plan should start now on this important issue. For Item No. 50, we are aware that studies being supported by CALFED will be coordinated with the mercury management strategies already beginning in the Sacramento River Watershed Program (SRWP) and the San Francisco Bay Mercury Council. For example, steps have already been initiated with the CALFED team to use the Cache Creek Mercury Work Group as the foundation of a broader group to look at the entire Sacramento River watershed.

Warren Harada
Agency Administrator

Robert F. Shanks
District Engineer

Wendell Kido
District Manager

2. Reduction of Organophosphate (OP) Pesticides (Bundle Actions No. 58, 59)

Stakeholders in the Sacramento River Watershed Program (SRWP) consider OP pesticides to be an important pollutant of concern, ranking with mercury for early action. The SRWP has started a water quality management strategy process involving its stakeholders, under the lead of the California Department of Pesticide Regulation (DPR) and participation of the Regional Board to begin developing steps to manage these parameters. CALFED should coordinate its funding in the Sacramento watershed with this activity of the SRWP.

3. Assessment of sources and magnitudes of loadings of drinking water constituents of concern (Bundle Actions 33 and 36)

Information on ambient conditions, source contributions and control measure effectiveness for drinking water parameters of concern is currently lacking. Resources are needed to develop this information to facilitate the identification of problems and solutions on a system-wide level.

Medium Priority Issues

This group includes Bundle Actions 7, 9, 10, 11, and 25. These actions appear to have widespread applicability and/or benefit in the CALFED solution area.

Low Priority Items

Bundle Action Items 6 and 25 are included in this group. While worthwhile efforts, they do not appear to have the same widespread effect of the other action items.

Possible Changes in Action Items Presented

Action Items No. 11, 36 and 33 refer to drinking water quality monitoring in the Delta region. These should be coordinated or combined so that duplication does not occur.

Proposed Stage I Action Items

Based on the listing contained on pages 97 to 100 of the Revised Phase II Report published on December 18, 1998, the District generally agrees with the ranking as it appears in that document. Specifically, for the Sacramento River watershed, the SRWP Toxics Subcommittee has developed the following ranking of pollutants of concern for the main stem of the river: (1) mercury and organophosphate pesticides, (2) drinking water parameters (TOC, TDS, pathogens) and unknown toxicity, and (3) other parameters (other pesticides, temperature, sediment, trace metals), which are of greater concern in tributaries or in restricted stretches of the main stem. As noted above, the SRWP has initiated stakeholder efforts in 1999 to develop water quality management strategies for mercury and organophosphate pesticides.

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Regarding the proposed actions for heavy metals (excluding mercury), the City and County of Sacramento, USGS and the Central Valley Regional Water Quality Control Board have conducted extensive low-level metals testing of the Sacramento River over the past seven years which has characterized the spatial and temporal extent of metals levels to a large degree. We believe that these results have shown that heavy metals levels are not a significant concern in the lower Sacramento River.

Implementation Strategies for Water Quality Program Actions

The District strongly endorses an interest-based, stakeholder process as the best approach to implementation of the Water Quality Program Actions. The District's experience in helping to form and implement the Sacramento River Watershed Program leads us to believe that the involvement of affected parties, state and federal agencies and other stakeholders is essential to the development and implementation of real solutions.

The District is pleased to provide these comments and looks forward to further contacts with CALFED in the future. If you have any questions about these comments please contact me at (916) 874-8239 or Jerry Troyan at (916) 875-9144.

Sincerely,



Robert F. Shanks
District Engineer

RFS:TG:jag

cc: Wendell Kido, Water Quality Division
Jerry Troyan, Water Quality Division
Keith DeVore, Water Resources Division
Jim Sequeira, City of Sacramento
Tom Grovhoug, Larry Walker Associates

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